

party pays the conversion costs, and (3) replacing overhead facilities with underground facilities in urban areas where factors such as load location and physical congestion make service impractical from overhead feeders.

The Public Staff also believes, however, that each of the Utilities should (1) identify the overhead facilities in each region it serves that repeatedly experience reliability problems based on measures such as number of outages or number of customer-hours out of service, (2) determine whether conversion to underground is a cost-effective option for improving the reliability of those facilities, and, if so, (3) develop a plan for converting those facilities to underground in an orderly and efficient manner, taking into account the outage histories and the impact on service reliability. Such a plan might include a policy similar to that of Dominion Virginia Power of annually identifying the “worst 10 circuits” and “worst 10 devices” in each of its regions and taking appropriate steps to improve or replace each of these circuits and devices.